

1 R. ALEXANDER SAVERI (SB# 173102)
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8 **UNITED STATES DISTRICT COURT FOR**
9 **THE NORTHERN DISTRICT OF CALIFORNIA**
10

11 Allen Loretz, individually and on behalf of
all others similarly situated,

12 Plaintiffs,

13 v.

14 Regal Stone, Ltd., Hanjin Shipping, Co.,
15 Ltd., Synergy Maritime, Ltd., Fleet
Management Ltd., and John Cota, *In*
16 *Personam*; M/V Cosco Busan, their engines,
tackle, equipment, appurtenances, freights,
17 and cargo *In Rem*,

18 Defendants.
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Case No. C 07-5800 SC
And related cases:

07-6045 SC, 08-2268 SC, 08-2052 SC,
08-5098 SC, 09-01469 SC

**DECLARATION OF R.
ALEXANDER SAVERI IN
SUPPORT OF CLASS COUNSELS'
MOTION FOR AWARD OF
ATTORNEYS' FEES AND COSTS**

1 I, R. ALEXANDER SAVERI, declare:

2 1. I am an attorney at law duly licensed to practice in the State of California and
3 before this Court, and am the managing partner of Saveri & Saveri, Inc., located in San
4 Francisco, California. I have personal knowledge of the matters stated herein and if called as a
5 witness, I could and would competently testify to the following.

6 2. For more than thirty-five years, my firm has specialized in complex, multi-district
7 and class action litigation, predominantly in the areas of securities, antitrust and product defects.
8 We have experience prosecuting class actions and other complex litigation in both state and
9 federal courts. I personally have practiced law since 1994, specializing in class action litigation,
10 and have served as lead counsel in class actions filed in state and federal courts in this district. I
11 have both filed and reviewed numerous fee applications in this district. Based on my experience,
12 I am familiar with the prevailing hourly rates charged by the Cotchett firm, as well as comparable
13 firms in this district for class actions.

14 3. At the request of Cotchett, Pitre & McCarthy, I have been asked to assess whether
15 the hourly rates charged by the Cotchett firm in Exhibit A, and used as a basis for a fee award in
16 this action, are in line with those prevailing in this district for similar services by lawyers and
17 employees of reasonably comparable skill, experience and reputation. In my experience, the
18 hourly rates charged by the Cotchett firm are comparable to the prevailing rates, including the
19 rates charged by attorneys at my firm.

20 4. I have further reviewed the hourly rates of Audet & Partners, LLP in Exhibit B
21 and have similarly found them in line with those prevailing in this District for similar service.

22 5. Recently, I was counsel of record in *Credit/Debit Card Tying Cases*, San
23 Francisco Superior Court Coordinated Proceeding No. 4335. Attached hereto as Exhibits C, D
24 and E are the hourly fee schedules for the firms Zelle Hoffmann Voelbel & Mason LLP, Susman
25 Godfrey LLP, and Cooper & Kirkham, P.C. Following a hearing before the Hon. Richard
26 Kramer, the fee requests based on the schedules herein attached were approved as reflective of
27 prevailing market hourly fee rates in the San Francisco Bay Area.

6. I have reviewed the rates of Cotchett, Pitre & McCarthy and Audet & Partners, which are comparable to these on the attached schedules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed August 20, 2010 at San Francisco, California.

R. Alexander Saveri
R. ALEXANDER SAVERI

DECLARATION OF R. ALEXANDER SAVERI IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS FEES AND COSTS; Case No. C 07-5800 SC

EXHIBIT A

COTCHETT, PITRE & McCARTHY

Tarantino - Crab

Lodestar Report

Inception Through June 29, 2010

NAME	RANK	TOTAL HOURS	HOURLY RATE	TOTAL FEES
Cotchett, Joseph W.	Partner	4.85	\$ 900	\$ 4,365.00
Fineman, Nancy L.	Partner	0.30	\$ 700	\$ 210.00
Pitre, Frank M.	Partner	106.80	\$ 775	\$ 82,770.00
SUB-TOTAL PARTNERS		111.95		\$ 87,345.00
Gross, Stuart G.	Associate	676.45	\$ 350	\$ 236,757.50
Sterrett, Daniel R.	Associate	26.05	\$ 350	\$ 9,117.50
Wilson, Joseph C.	Associate	7.65	\$ 350	\$ 2,677.50
SUB-TOTAL ASSOCIATES		710.15		\$ 248,552.50
Engineer, Nirav	Sr. Paralegal	99.75	\$ 250	\$ 24,937.50
Grafilo, Mark A	Sr. Paralegal	2.70	\$ 250	\$ 675.00
Thornton, Donald D.	Sr. Paralegal	19.70	\$ 175	\$ 3,447.50
Beltran, Eileen	Case Asst/Paralegal	30.25	\$ 225	\$ 6,806.25
Knabity, Kenneth	Case Asst/Paralegal	2.10	\$ 150	\$ 315.00
Manuel, Ryan	Case Asst/Paralegal	237.25	\$ 225	\$ 53,381.25
So, Kimberly	Case Asst/Paralegal	32.45	\$ 150	\$ 4,867.50
Song, Jenny	Case Asst/Paralegal	8.80	\$ 225	\$ 1,980.00
Szeto, Oni	Case Asst/Paralegal	0.40	\$ 225	\$ 90.00
SUB-TOTAL PARALEGALS		433.40		\$ 96,500.00
Coleman, Elizabeth	Law Clerk	8.45	\$ 150	\$ 1,267.50
Gambino, Robert	Law Clerk	4.85	\$ 150	\$ 727.50
SUB-TOTAL LAW CLERKS		13.30		\$ 1,995.00
GRAND TOTAL		1,268.80		\$ 434,392.50

EXHIBIT B

Audet & Partners, LLP
Attorneys - at - Law

221 MAIN STREET, SUITE 1460
SAN FRANCISCO, CA 94105
TELEPHONE: 415.568.2555
FACSIMILE: 415.568.2556
TOLL FREE: 800.965.1461
www.audetlaw.com

Loretz v. Regal Stone
Case No. C 07 5800 SC
Through May 31, 2010

Attorney	Hours	Rate (per hour)	Common Lodestar
William M. Audet (P)	639.82	\$650.00	\$415,883.00
Michael McShane (P)	262.75	\$595.00	\$156,336.25
Adel Nadji (A)	636.36	\$425.00	\$270,453.00
Attorney Total:			\$842,672.25
Legal Assistant / Paralegal:			
Adrienne Brennan	93.75	\$110.00	\$10,312.50
A. Bustamante	1.25	\$100.00	\$ 125.00
Robert Chao	8.50	\$100.00	\$ 850.00
Andrea Chamberlin	12.8	\$125.00	\$1,600.00
Ted Chase	164.25	\$110.00	\$18,067.50
Frank Dessau	105.30	\$125.00	\$13,162.50
Rita Guarino	14.15	\$110.00	\$1,556.50
K. Toth	1.22	\$110.00	\$ 134.20
Hannah Weinberg	15.50	\$110.00	\$1,705.00
Legal Assistant / Paralegal Total:			\$47,513.20
Total Hours			1955.65
Firm Lodestar			\$890,185.45
Audet Firm's requested up to 1.5x multiplier:			\$1,335,278.18

EXHIBIT C

TIME REPORT

Firm Name: Zelle Hofmann Voelbel & Mason LLP

Time Period: Inception through June 30, 2010

Categories:

(1) Investigations, Factual Research

(2) Discovery

(3) Pleadings, Briefs and Pretrial Motions

(4) Court Appearances

(5) Settlements

(6) Litigation Strategy, Analysis and Case Management

(7) Class Certification

(P) Partner
(A) Associate
(LC) Law Clerk
(PL) Paralegal
(L) Librarian
(LS) Lit Support

ATTORNEY OR PARALEGAL	1	2	3	4	5	6	7	HOURS	HOURLY RATE	LODESTAR
Francis O. Scarpulla (P)			1.50		2.10	8.60		12.20	975.00	11,895.00
Daniel S. Mason (P)					0.10	1.50		1.60	850.00	1,360.00
Craig C. Corbitt (P)		15.80	173.50	61.00	249.70	215.85	101.10	816.95	850.00	694,407.50
Joseph W. Bell (P)			7.50			17.30		24.80	740.00	18,352.00
Jiangxio (Athena) Hou (P)				3.50				3.50	600.00	2,100.00
Judith A. Zahid (P)		135.00	392.30	102.60	99.20	242.00	109.00	1080.10	590.00	637,259.00
Michael Christian (A)			18.30			5.50		23.80	610.00	14,518.00
David P. Nemecek (A)	0.40					1.00		1.40	535.00	749.00
Jose M. Umbert (A)	3.00	33.80	328.50	6.30	132.80	222.60	312.40	1039.40	535.00	556,079.00
Qianwei Fu (A)			70.80					70.80	485.00	34,338.00
Lauren N. Vuong (A)	0.70		5.90			41.10		47.70	420.00	20,034.00
Demetrius X Lambrinos (A)			103.90	7.30		53.70		164.90	460.00	75,854.00
Anna C. Conley (A)			56.10	6.20		9.40		71.70	420.00	30,114.00
Eric W. Buetzow (A)		21.30	34.70		29.30			85.30	435.00	37,105.50
Jane N. Yi (A)					3.00			3.00	420.00	1,260.00
Hearther T. Rankie (A)			52.60			1.50		54.10	395.00	21,369.50
Attorney Totals	4.10	205.90	1245.60	186.90	516.20	820.05	522.50	3501.25		2,156,794.50
Ivy Zabala (LT)		72.2						72.2	290.00	20,938.00
Robert Newman (PL)	0.4		28.9			5.2	1.2	35.7	260.00	9,282.00
David S. Chi (PL)			3.7					3.7	260.00	962.00
Leethea Lentz (PL)		32.6	8					40.6	220.00	8,932.00

EXHIBIT D

EXHIBIT E

EXHIBIT 2
TIME REPORT

Firm Name: COOPER & KIRKHAM, P.C.

Time Period: Inception through May 31, 2010

Categories: (1) Investigations, Factual Research

(2) Discovery

(3) Pleadings, Briefs and Pretrial Motions (includes legal research)

(4) Court Appearances

(5) Settlements

(6) Litigation Strategy, Analysis and Case Management

(7) Case Certification

(P) Partner
(A) Associate
(LC) Law Clerk
(PL) Paralegal
(L) Librarian
(LS) Lit Support

ATTORNEY OR PARALEGAL	1	2	3	4	5	6	7	HOURS	HOURLY RATE	LODESTAR
Josef Cooper (P)	0.00	1.40	82.80	21.70	22.80	12.90	4.90	146.50	950.00	139,175.00
Tracy Kirkham (A)	0.00	12.80	92.10	29.80	27.90	3.60	37.90	204.10	825.00	168,382.50
John Bogdanov (PL)	36.90	0.00	154.90	0.00	1.10	0.20	0.00	193.10	550.00	106,205.00
								0.00		0.00
								0.00		0.00
Attorney Totals	36.90	14.20	329.80	51.50	51.80	16.70	42.80	543.70		413,762.50
									0	0.00
									0	0.00
									0	0.00
									0	0.00
									0	0.00
									0	0.00
									0	0.00
									0	0.00
									0	0.00
									0	0.00
									0	0.00
Non-Attorney Totals:	0	0	0	0	0	0	0	543.70		413,762.50